BLACK & WADHAMS RUSTY GRAF, Esq.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Nevada Bar No. 6322

10777 West Twain Avenue, 3rd Floor

Las Vegas, Nevada 89135 Telephone: (702) 869-8801

Facsimile: (702) 869-2669

E-mail: rgraf@blackwadhams.law

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

DANIEL LUCERO, Case No. 2:21-cv-00915-RFB-VCF Plaintiff, STIPULATION AND ORDER TO EXTEND TIME FOR OPPOSITION ON v. **DEFENDANT'S MOTION TO DISMISS** ISABEL GUZMAN, ADMINISTRATOR PLAINTIFF'S COMPLAINT SMALL BUSINESS ADMINISTRATION, FIRST REQUEST Defendant.

COMES NOW, Plaintiff, DANIEL LUCERO, an individual, (hereinafter, "Plaintiff"), by and through his attorney, Rusty Graf, Esq. of the law firm of Black & Wadhams., and Defendant ISABEL GUZMAN¹, ADMINISTRATOR SMALL BUSINESS ADMINISTRATION (hereafter "Defendant") by and through her attorney Holly A. Vance, Esq., Assistant United States Attorney of the United States Attorney's Office, and hereby stipulate and agree that Plaintiff's opposition to the Motion needs to be extended due to the coronavirus pandemic. Counsel for Plaintiff has experienced issues related to work stoppage and staff support in allowing the preparing and timely

¹ The complaint refers to Defendant as "Isabel Guzman" but her name is "Isabella Casillas Guzman."

BLACK & WADHAMS 10777 W. Twain Avenue, 3rd Floor Las Vegas, Nevada 89135 (702) 869-8801 FAX: (702) 869-2669

20

21

22

23

24

25

26

27

28

1 filing of the Opposition. Therefore, due to such hardships and good cause, the requested motion 2 to extend is appropriate. 3 Plaintiff's opposition to the Motion will be due October 12, 2021. Defendant's Reply to 4 Plaintiff's opposition will be due October 19, 2021. 5 Dated: September , 2021 Dated: September , 2021 6 7 **BLACK & WADHAMS UNITED STATES ATTTORNEY** 8 By: /s/ Rusty Graf By: /s/Holly A. Vance, Esq. 9 Rusty Graf, Esq. Holly A. Vance, Esq. 10777 West Twain Avenue, Suite 300 400 S. Virginia Street 10 Reno, NV 89501 Las Vegas, NV 89135 11 rgraf@blackwadhams.law Holly.A.Vance@usdoj.gov Attorneys for Plaintiff Attorneys for Defendant 12 13 14 15 16 17 18 19

Case 2:21-cv-00915-RFB-VCF Document 17 Filed 09/27/21 Page 2 of 3

28

1		ORDER
2 3	IT IS HEREBY ORDERED that Plaintiff's opposition will be due October 12, 2021.	
4	ITS IS FURTHER ORDERED Defendant's reply to Plaintiff's Opposition will be due	
5	October 19, 2021.	
6	IT IS SO ORDERED this 27th day of September, 2021.	
7	11 16 50 ORDERED unis <u>27ui</u>	ady of <u>September</u> , 2021.
8		42
9	Respectfully submitted by:	RICHARD E BOOLWARE, II
10	BLACK & WADHAMS	United States District Court
11		
12	/s/ Rusty Graf RUSTY GRAF, ESQ.	
13	Nevada Bar No. 6322	
14	10777 W. Twain Ave., 3 rd Fl. Las Vegas, Nevada 89135	
15	Attorneys for Plaintiff	
16	Accepted as to form and content:	
17		
18	UNITED STATES ATTORNEY	
19	/s/ Holly A. Vance, Esq.	
20	Holly A. Vance, Esq. Nevada Bar No. 14853	
21	400 Virginia Street., Suite 900	
22	Reno, NV 89501 Attorneys for Defendant	
23		
24		
25		
26		
27		
	II .	